

**EXHIBIT B**

**UNREDACTED VERSION**

**OF DOCUMENT**

**SOUGHT TO BE SEALED**

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and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S OBJECTIONS  
AND RESPONSES TO WAYMO'S  
THIRD SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS  
(NOS. 153-265)**

Trial Date: October 2, 2017

1 In accordance with Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants  
2 Uber Technologies, Inc. and Ottomotto LLC (collectively “Defendants”) object and respond to  
3 Plaintiff Waymo LLC’s Third Set of Requests for Production of Documents, served on May 31,  
4 2017.

### 5 **GENERAL OBJECTIONS**

6 Defendants make the following general responses and objections (“General Objections”)  
7 to each definition, instruction, and request propounded in Waymo’s Requests for Production of  
8 Documents. These General Objections are hereby incorporated into each specific response. The  
9 assertion of the same, similar or additional objections or partial responses to the individual  
10 requests does not waive any of Defendants’ General Objections.

11 1. Defendants object to each Request, Definition, or Instruction to the extent it seeks  
12 or purports to impose obligations beyond or inconsistent with those imposed by the Federal Rules  
13 of Civil Procedure or the applicable rules and orders of this Court.

14 2. Nothing in these responses is an admission by Defendants of the existence,  
15 relevance, or admissibility of any information, for any purpose. Defendants reserve all objections  
16 as to competency, relevance, materiality, privilege, or admissibility related to the use of its  
17 responses and any document or thing identified in its responses as evidence for any purpose  
18 whatsoever in any subsequent proceeding in this trial or any other action.

19 3. Defendants object to each Request to the extent it seeks information not within  
20 Defendants’ possession, custody, or control and not kept by Defendants in their ordinary course  
21 of business. Defendants will provide only relevant, non-privileged information that is within their  
22 present possession, custody, or control and available after a reasonable investigation.

23 4. Defendants object to these Requests insofar as they purport to require Defendants  
24 to search for information beyond that which is available after a reasonable search as it relates to  
25 this case and the scope of discovery at this stage.

26 5. Defendants object to each Request to the extent that it is not limited in time.  
27 Defendants will produce information from a reasonable time period as it relates to this case.

28 6. Defendants object to each Request to the extent it seeks a response from persons or

1 entities that are not parties to the lawsuit and over whom Defendants have no control. Defendants  
2 respond to the Requests on Defendants' own behalf.

3 7. To the extent any Request, Instruction, or Definition may be construed as calling  
4 for disclosure of information subject to the attorney-client privilege, work-product immunity,  
5 joint defense or common interest, or any other applicable privilege or protection, Defendants  
6 hereby claim such privileges and immunities and object on such grounds. Defendants do not  
7 waive, intentionally or otherwise, any attorney-client privilege, work-product immunity, joint  
8 defense or common-interest privilege or any other privilege, immunity, or other protection that  
9 may be asserted to protect information from disclosure.

10 8. Defendants object to the Requests to the extent that they are compound, complex  
11 and contain multiple subparts.

12 9. Defendants object to the definitions of "WAYMO," "GOOGLE," and "OTTO  
13 TRUCKING," as overbroad, vague, and ambiguous because Defendants do not know, for  
14 example, all "current and former employees, counsel, agents, consultants, representatives, and  
15 any other persons acting on behalf of" each entity.

16 10. Defendants object to Instruction No. 1 as overbroad, unduly burdensome, and not  
17 proportional to the needs of the case to the extent it purports to impose duties greater than those  
18 set forth in Paragraphs 12 and 13 of the Court's Supplemental Order to Order Setting Initial Case  
19 Management Conference in Civil Cases Before Judge William Alsup ("Supplemental Order").

20 11. Defendants object to Instruction Nos. 3 through 5 as overbroad, unduly  
21 burdensome, and not proportional to the needs of the case to the extent they purport to impose  
22 duties greater than those set forth in Paragraph 14 of the Court's Supplemental Order.

23 12. Defendants object to Instruction No. 7 as overbroad, unduly burdensome, and not  
24 proportional to the needs of the case, including to the extent it purports to impose duties greater  
25 than those set forth in Paragraph 12 to the Court's Supplemental Order.

26 13. Although Defendants have diligently complied with their discovery obligations at  
27 this stage, their investigations in connection with this litigation are continuing. These responses  
28 are limited to information obtained to date and are given without prejudice to Defendants' right to

1 amend or supplement their responses after considering information obtained through further  
2 discovery or investigation.

3 Subject to without waiving its General Objections, Defendants object and respond to the  
4 Requests as follow:

5 **SPECIFIC OBJECTIONS AND RESPONSES**

6 **REQUEST FOR PRODUCTION NO. 153:**

7 All DOCUMENTS and COMMUNICATIONS REGARDING the Project Chauffeur  
8 Bonus Program.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 153:**

10 Defendants will produce responsive, non-privileged DOCUMENTS, if such  
11 DOCUMENTS exist, can be located through a reasonably diligent search, and concern  
12 Mr. Levandowski.

13 Defendants object to this Request to the extent that it seeks information protected by the  
14 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
15 from discovery. Defendants further object to this Request as irrelevant, overbroad, and not  
16 proportional to the needs of the case to the extent that it seeks “all” documents. Defendants also  
17 object that the term “Project Chauffeur Bonus Program” is undefined.

18  
19 **REQUEST FOR PRODUCTION NO. 154:**

20 All agreements between any DEFENDANT and Nevada ATCF LLC.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 154:**

22 Pursuant to the telephone conference with Special Master John L. Cooper on June 30,  
23 2017, this Request has been withdrawn.

24  
25 **REQUEST FOR PRODUCTION NO. 155:**

26 All DOCUMENTS and COMMUNICATIONS REGARDING any agreements between  
27 any DEFENDANT and Nevada ATCF LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 155:**

Pursuant to the telephone conference with Special Master John L. Cooper on June 30, 2017, this Request has been withdrawn.

**REQUEST FOR PRODUCTION NO. 156:**

All COMMUNICATIONS between LEVANDOWSKI and any PERSON (INCLUDING DEFENDANTS) REGARDING Nevada ATCF LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 156:**

Defendants will produce non-privileged COMMUNICATIONS responsive to this Request, if any, located through a reasonably diligent search.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case to the extent that it seeks “all” documents and communications. Defendants further object to this Request on the grounds that the term “REGARDING” is vague and ambiguous in the context of this Request.

**REQUEST FOR PRODUCTION NO. 157:**

DOCUMENTS sufficient to show the reasons behind DEFENDANTS’ and/or OTTO TRUCKING’s decision not to deploy self-driving trucks in Texas.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 157:**

Pursuant to the telephone conference with Special Master John L. Cooper on June 30, 2017, this Request has been withdrawn.

**REQUEST FOR PRODUCTION NO. 158:**

DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado, Pennsylvania, Arizona, and California.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 158:**

Defendants will produce a non-privileged DOCUMENT or DOCUMENTS responsive to this Request, if any, located through a reasonably diligent search.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation.

**REQUEST FOR PRODUCTION NO. 159:**

DOCUMENTS sufficient to show the total number of miles DEFENDANTS' self-driving trucks have traveled each month in each state, broken out by month and by state.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 159:**

Defendants object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation. Defendants additionally object that responding to this Request would be oppressive and unduly burdensome, including because it would require research, investigation, and compilation of data.

Defendants will not produce documents in response to this Request.

**REQUEST FOR PRODUCTION NO. 160:**

DOCUMENTS sufficient to show DEFENDANTS' past, present, and future plans to test self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado, Pennsylvania, Arizona, and California.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 160:**

Defendants refer Plaintiff to their response to Request No. 158.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation. Defendants additionally object that responding to this Request would be oppressive and unduly burdensome.

**REQUEST FOR PRODUCTION NO. 161:**

All DOCUMENTS and COMMUNICATIONS REGARDING the naming of FUJI.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 161:**

Defendants will produce non-privileged documents sufficient to show the naming of FUJI, if any, located through a reasonably diligent search.

Defendants object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation. Defendants further object to this request as irrelevant, overbroad, and not proportional to the needs of the case to the extent that it seeks “all” documents and communications.

**REQUEST FOR PRODUCTION NO. 162:**

All DOCUMENTS and COMMUNICATIONS REGARDING the naming of SPIDER.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 162:**

Defendants will produce non-privileged documents sufficient to show the naming of SPIDER, if any, located through a reasonably diligent search.

Defendants object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope,



1 subject matter, and time, and is irrelevant and not proportional to the needs of the case to the  
2 extent it calls for the production of documents that are unrelated to this litigation. Defendants  
3 further object to this request as irrelevant, overbroad, and not proportional to the needs of the case  
4 to the extent that it seeks “all” documents and communications.

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6 **REQUEST FOR PRODUCTION NO. 163:**

7 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of OWL.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 163:**

9 Defendants will produce non-privileged documents sufficient to show the naming of  
10 OWL, if any, located through a reasonably diligent search.

11 Defendants object to this Request as irrelevant, overbroad, and not proportional to the  
12 needs of the case; specifically, Defendants object that the Request is overbroad as to scope,  
13 subject matter, and time, and is irrelevant and not proportional to the needs of the case to the  
14 extent it calls for the production of documents that are unrelated to this litigation. Defendants  
15 further object to this request as irrelevant, overbroad, and not proportional to the needs of the case  
16 to the extent that it seeks “all” documents and communications.

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18 **REQUEST FOR PRODUCTION NO. 164:**

19 All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING  
20 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 164:**

22 Defendants have already produced COMMUNICATIONS responsive to this Request,  
23 including, without limitation, in Production Volume 52. Defendants will produce additional  
24 responsive, non-privileged COMMUNICATIONS between Brian McClendon and any person  
25 regarding Ottomotto, Otto Trucking, or Anthony Levandowski before August 23, 2016, and  
26 regarding Mr. Levandowski after August 23, 2016, if such COMMUNICATIONS exist and can  
27 be located through a reasonably diligent search.

1 Defendants object to this Request to the extent that it seeks information protected by the  
2 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
3 from discovery. Defendants further object to this Request as irrelevant, overbroad, and not  
4 proportional to the needs of the case; specifically, Defendants object that the Request is overbroad  
5 as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the  
6 case to the extent it calls for the production of documents that are unrelated to this litigation.  
7 Defendants further object to this request as irrelevant, overbroad, and not proportional to the  
8 needs of the case to the extent that it seeks “all” documents and communications. Defendants  
9 additionally object that responding to this Request would be oppressive and unduly burdensome.  
10

11 **REQUEST FOR PRODUCTION NO. 165:**

12 All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING  
13 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 165:**

15 Defendants have already produced COMMUNICATIONS responsive to this Request,  
16 including, without limitation, in Production Volume 52, which included all communications  
17 between Travis Kalanick and Anthony Levandowski; communications between Mr. Kalanick and  
18 anyone regarding LiDAR; and communications between Mr. Kalanick and anyone regarding  
19 Mr. Levandowski, Ottomotto, or Otto Trucking before August 23, 2016. Defendants will produce  
20 additional responsive, non-privileged COMMUNICATIONS between Mr. Kalanick and anyone  
21 regarding Mr. Levandowski after August 23, 2016, if such COMMUNICATIONS exist and can  
22 be located through a reasonably diligent search.

23 Defendants object to this Request to the extent that it seeks information protected by the  
24 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
25 from discovery. Defendants further object to this Request as irrelevant, overbroad, and not  
26 proportional to the needs of the case; specifically, Defendants object that the Request is overbroad  
27 as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the  
28 case to the extent it calls for the production of documents that are unrelated to this litigation.

1 Defendants further object to this request as irrelevant, overbroad, and not proportional to the  
2 needs of the case to the extent that it seeks “all” documents and communications. Defendants  
3 additionally object that responding to this Request would be oppressive and unduly burdensome.

4  
5 **REQUEST FOR PRODUCTION NO. 166:**

6 All COMMUNICATIONS between John Bares and any PERSON REGARDING  
7 OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 166:**

9 Defendants have already produced COMMUNICATIONS responsive to this Request,  
10 including, without limitation, in Production Volumes 22 and 51. Defendants will produce  
11 additional responsive, non-privileged COMMUNICATIONS between John Bares and any person  
12 regarding Ottomotto, Otto Trucking, or Anthony Levandowski before August 23, 2016, and  
13 regarding Mr. Levandowski after August 23, 2016, if such COMMUNICATIONS exist and can  
14 be located through a reasonably diligent search.

15 Defendants object to this Request to the extent that it seeks information protected by the  
16 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
17 from discovery. Defendants further object to this Request as irrelevant, overbroad, and not  
18 proportional to the needs of the case; specifically, Defendants object that the Request is overbroad  
19 as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the  
20 case to the extent it calls for the production of documents that are unrelated to this litigation.  
21 Defendants further object to this request as irrelevant, overbroad, and not proportional to the  
22 needs of the case to the extent that it seeks “all” documents and communications. Defendants  
23 additionally object that responding to this Request would be oppressive and unduly burdensome.

24  
25 **REQUEST FOR PRODUCTION NO. 167:**

26 All COMMUNICATIONS between Cameron Poetzsch and any PERSON  
27 REGARDING LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 167:**

Defendants will produce responsive, non-privileged COMMUNICATIONS between Cameron Poetzsch and any person regarding LiDAR or Anthony Levandowski.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants have already furnished privilege logs for documents that potentially could be responsive to the Court's March 16, 2017 order. To the extent this Request seeks additional documents, Defendants object that it is overbroad, unduly burdensome, and not proportional to the needs of the case insofar as it seeks "all" documents and communications. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation. To the extent this request seeks all communications between Mr. Poetzsch and anyone regarding Ottomotto or Otto Trucking, it is overbroad, unduly burdensome, and not proportional to the needs of the case. Such documents are subsumed within Waymo's Request for Production No. 28 and 29 regarding negotiations over Uber's acquisition of Ottomotto and due diligence related to same, about which the parties are presently conferring. Defendants additionally object that responding to this Request would be oppressive and unduly burdensome.

**REQUEST FOR PRODUCTION NO. 168:**

All minutes of meetings of any of DEFENDANTS' Board of Directors, or any committee thereof, during which LiDAR was discussed.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 168:**

Defendants will produce non-privileged Board of Directors meeting minutes responsive to this Request located through a reasonably diligent search.

1 Defendants object to this Request to the extent that it seeks information protected by the  
2 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
3 from discovery.

4  
5 **REQUEST FOR PRODUCTION NO. 169:**

6 All minutes of meetings of UBER’s Board of Directors, or any committee thereof, during  
7 which OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI was discussed.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 169:**

9 Defendants will produce non-privileged Board of Directors meeting minutes responsive to  
10 this Request located through a reasonably diligent search.

11 Defendants object to this Request to the extent that it seeks information protected by the  
12 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
13 from discovery.

14  
15 **REQUEST FOR PRODUCTION NO. 170:**

16 All DOCUMENTS REGARDING LiDAR that were prepared for or received by any of  
17 DEFENDANTS’ Board of Directors, or any committee thereof.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 170:**

19 Defendants will produce non-privileged DOCUMENTS that were sent or presented to  
20 Uber’s Board of Directors or any committee thereof responsive to this Request, if any, located  
21 through a reasonably diligent search.

22 Defendants object to this Request to the extent that it seeks information protected by the  
23 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
24 from discovery. Defendants further object to this Request on the grounds that the term  
25 “REGARDING” is vague and ambiguous in the context of this Request.

**REQUEST FOR PRODUCTION NO. 171:**

All DOCUMENTS REGARDING OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI that were prepared for or received by UBER's Board of Directors, or any committee thereof.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 171:**

Defendants will produce non-privileged DOCUMENTS that were sent or presented to Uber's Board of Directors or any committee thereof responsive to this Request, if any, located through a reasonably diligent search.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request on the grounds that the term "REGARDING" is vague and ambiguous in the context of this Request.

**REQUEST FOR PRODUCTION NO. 172:**

All roadmaps, timelines, and development schedules REGARDING LiDAR.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 172:**

Defendants have made available for inspection Uber's facilities, email, computers, documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In doing so, Uber has made available for inspection over 383,000 emails and documents; the devices of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, and James Haslim; and all four locations at which there is ongoing LiDAR development. To date, Waymo has conducted approximately 55 hours of inspection, with additional requests for investigation.

In addition, Defendants have already produced other non-privileged documents responsive to this Request, including, for example, drafts of the milestones document.

Defendants will produce additional non-privileged documents responsive to this Request, if such documents exist and can be located through a reasonably diligent search.

1 To the extent this Request seeks anything other than the previously described information,  
2 Defendants object to the portion of this Request seeking “all” such documents as overbroad,  
3 unduly burdensome, and not proportional to the needs of the case. Defendants further object to  
4 this Request to the extent that it seeks information protected by the attorney-client privilege or the  
5 work product doctrine or that is otherwise privileged or protected from discovery. Defendants  
6 object to this Request as unreasonably overbroad to the extent that it requests information about  
7 third-party LiDAR designs and/or implicates non-disclosure agreements with third parties.  
8 Defendants further object to this Request on the ground that the terms “roadmaps,” “timelines,”  
9 and “development schedules” are vague and ambiguous.  
10

11 **REQUEST FOR PRODUCTION NO. 173:**

12 All roadmaps, timelines, and development schedules REGARDING self-driving vehicles.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 173:**

14 Defendants have made available for inspection Uber’s facilities, email, computers,  
15 documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In  
16 doing so, Uber has made available for inspection over 383,000 emails and documents; the devices  
17 of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, and  
18 James Haslim; and all four locations at which there is ongoing LiDAR development. To date,  
19 Waymo has conducted approximately 55 hours of inspection, with additional requests for  
20 investigation.

21 In addition, Defendants have already produced other non-privileged documents responsive  
22 to this Request, including, for example, drafts of the milestones document.

23 Defendants will produce additional non-privileged documents, if such documents exist  
24 and can be located through a reasonably diligent search, sufficient to show roadmaps, timelines,  
25 and development schedules for Defendants’ self-driving vehicles using LiDAR sensors.

26 Defendants object to this Request to the extent that it seeks information protected by the  
27 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
28 from discovery. Defendants object to the portion of this Request seeking “all” such documents as

1 overbroad, unduly burdensome, and not proportional to the needs of the case. Defendants object  
2 to “self-driving vehicles” as overbroad, unduly burdensome, and not proportional to the needs of  
3 the case. Defendants further object to this Request on the ground that the terms “roadmaps,”  
4 “timelines,” and “development schedules” are vague and ambiguous.

5  
6 **REQUEST FOR PRODUCTION NO. 174:**

7 All forecasts, market analyses, or market projects REGARDING self-driving vehicles.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 174:**

9 Defendants have made available for inspection Uber’s facilities, email, computers,  
10 documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In  
11 doing so, Uber has made available for inspection over 383,000 emails and documents; the devices  
12 of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, and  
13 James Haslim; and all four locations at which there is ongoing LiDAR development. To date,  
14 Waymo has conducted approximately 55 hours of inspection, with additional requests for  
15 investigation.

16 Defendants will produce additional non-privileged documents, if such documents exist  
17 and can be located through a reasonably diligent search, sufficient to show forecasts and market  
18 analyses for Defendants’ self-driving vehicles using LiDAR sensors.

19 Defendants object to this Request to the extent that it seeks information protected by the  
20 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected  
21 from discovery. Defendants object to the portion of this Request seeking “all” such documents as  
22 overbroad, unduly burdensome, and not proportional to the needs of the case. Defendants object  
23 to “self-driving vehicles” as overbroad, unduly burdensome, and not proportional to the needs of  
24 the case. Defendants further object to this Request on the ground that the term “market project” is  
25 vague, ambiguous, and incomprehensible.



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**REQUEST FOR PRODUCTION NO. 178:**

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**REQUEST FOR PRODUCTION NO. 180:**

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**REQUEST FOR PRODUCTION NO. 181:**

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**REQUEST FOR PRODUCTION NO. 182:**

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**REQUEST FOR PRODUCTION NO. 183:**

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**REQUEST FOR PRODUCTION NO. 184:**

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**REQUEST FOR PRODUCTION NO. 185:**

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**REQUEST FOR PRODUCTION NO. 186:**

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**REQUEST FOR PRODUCTION NO. 187:**

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[illegible]

**REQUEST FOR PRODUCTION NO. 189:**

A series of 20 horizontal black bars of varying lengths, representing a list of redacted items. The bars are arranged in a single column, with some bars being longer than others, creating a jagged right edge. The bars are solid black and have no text or other markings on them.

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**REQUEST FOR PRODUCTION NO. 192:**

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**REQUEST FOR PRODUCTION NO. 193:**

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**REQUEST FOR PRODUCTION NO. 194:**

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**REQUEST FOR PRODUCTION NO. 195:**

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**REQUEST FOR PRODUCTION NO. 196:**

[REDACTED]

[illegible]

**REQUEST FOR PRODUCTION NO. 198:**

[illegible]

## This image consists of approximately 20 horizontal black bars of different lengths, stacked vertically. These bars represent redacted information from a document. The lengths vary significantly, with some bars spanning most of the width of the page and others being much shorter, indicating varying amounts of text were obscured at each point.

DOCUMENTS sufficient to show all self-driving car test scenarios that informed, drove, or influenced any LiDAR design considered or implemented by DEFENDANTS.



**RESPONSE TO REQUEST FOR PRODUCTION NO. 200:**

Defendants have already produced documents responsive to this Request, including without limitation, documents produced in connection with Notices of Deposition for Asheem Linaval. Specifically, Defendants produced PowerPoint presentations, notes, and calculations from the custodial files of Scott Boehmke.

In addition, Defendants have made available for inspection Uber’s facilities, email, computers, documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In doing so, Uber has made available for inspection over 383,000 emails and documents; the devices of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, and James Haslim; and all four locations at which there is ongoing LiDAR development. To date, Waymo has conducted approximately 55 hours of inspection, with additional requests for investigation.

Defendants will produce additional non-privileged documents, if such documents exist and can be located through a reasonably diligent search, sufficient to show additional self-driving test scenarios used for Defendants’ LiDAR designs.

To the extent this Request seeks anything other than the previously described information, Defendants also object to this Request as unreasonably overbroad, irrelevant, outside the scope of this litigation, harassing, and not proportional to the needs of the case, including to the extent that it requests information about LiDAR designs developed by third-parties and/or implicates non-disclosure agreements with third parties. Defendants also object to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks “all” “self-driving car test scenarios[.]” Defendants further object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to the use of the phrases “self-driving car test scenarios,” “informed, drove, or influenced,” and “considered or implemented” are vague and ambiguous.

**REQUEST FOR PRODUCTION NO. 201:**

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**REQUEST FOR PRODUCTION NO. 202:**

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**REQUEST FOR PRODUCTION NO. 203:**

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**REQUEST FOR PRODUCTION NO. 204:**

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**REQUEST FOR PRODUCTION NO. 211:**

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**REQUEST FOR PRODUCTION NO. 212:**

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**REQUEST FOR PRODUCTION NO. 215:**

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**REQUEST FOR PRODUCTION NO. 216:**

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**REQUEST FOR PRODUCTION NO. 217:**

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**REQUEST FOR PRODUCTION NO. 219:**

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**REQUEST FOR PRODUCTION NO. 220:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 221:**

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**REQUEST FOR PRODUCTION NO. 222:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 223:**

[REDACTED]

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[illegible]

**REQUEST FOR PRODUCTION NO. 226:**

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**REQUEST FOR PRODUCTION NO. 227:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 228:**

[REDACTED]

[REDACTED]



**RESPONSE TO REQUEST FOR PRODUCTION NO. 228:**

[REDACTED]

[REDACTED]

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 229:**

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**REQUEST FOR PRODUCTION NO. 230:**

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**REQUEST FOR PRODUCTION NO. 231:**

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**REQUEST FOR PRODUCTION NO. 232:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 233:**

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[REDACTED]

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**REQUEST FOR PRODUCTION NO. 234:**

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**REQUEST FOR PRODUCTION NO. 235:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 236:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 237:**

[REDACTED]



[illegible]

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 240:**

[REDACTED]

**REQUEST FOR PRODUCTION NO. 241:**

[REDACTED]

**REQUEST FOR PRODUCTION NO. 242:**

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**REQUEST FOR PRODUCTION NO. 243:**

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**REQUEST FOR PRODUCTION NO. 244:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 245:**

[REDACTED]

**REQUEST FOR PRODUCTION NO. 246:**

A series of 20 horizontal black bars of varying lengths, arranged in a staggered, descending pattern from top-left to bottom-right, resembling a staircase or a series of steps. The bars are solid black and have no text or other markings.

**REQUEST FOR PRODUCTION NO. 247:**

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**REQUEST FOR PRODUCTION NO. 248:**

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**REQUEST FOR PRODUCTION NO. 249:**

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**REQUEST FOR PRODUCTION NO. 250:**

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**REQUEST FOR PRODUCTION NO. 251:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 252:**

DOCUMENTS sufficient to show all PCB design schematics for LiDAR transmit boards considered or implemented by DEFENDANTS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 252:**

Defendants have already produced documents responsive to this Request, including without limitation schematics, assembly drawings, and CAD files of Fuji transmit boards and communications with Gorilla Circuits.

Defendants have made also available for inspection the Fuji device, Owl device, and Spider components. In addition, Defendants have made available for inspection Uber's facilities, email, computers, documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In doing so, Uber has made available for inspection over 383,000 emails and documents; the devices of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, James Haslim, and Asheem Linaval; and all four locations at which there is ongoing LiDAR development. To date, Waymo has conducted approximately 55 hours of inspection, with additional requests for investigation.

Defendants will produce additional non-privileged documents and communications, if such documents exist and can be located through a reasonably diligent search, sufficient to show PCB design schematics for LiDAR transmit boards in LiDAR designs developed by Defendants.

To the extent this Request seeks anything other than the previously described information, Defendants object to this Request as unreasonably overbroad, irrelevant, outside the scope of this litigation, harassing, and not proportional to the needs of the case, including to the extent that it requests information about LiDAR designs developed by third-parties and to the extent that it seeks “all PCB design schematics.” Defendants further object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request on the ground that the phrase “considered or implemented” is vague and ambiguous.

**REQUEST FOR PRODUCTION NO. 253:**

DOCUMENTS sufficient to show all PCB design schematics for LiDAR receive boards considered or implemented by DEFENDANTS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 253:**

Defendants have already produced documents responsive to this Request, including without limitation documents produced in connection with Expedited Request for Production No. 1 and Expedited Interrogatory No. 22. Specifically, Defendants have produced circuit designs for the receive board, email correspondences with Gorilla Circuits and [REDACTED] regarding the receive board and/or circuitry.

Defendants have made also available for inspection the Fuji device, Owl device, and Spider components. In addition, Defendants have made available for inspection Uber’s facilities, email, computers, documents, design files, and source code in San Francisco and Pittsburgh on eight occasions. In doing so, Uber has made available for inspection over 383,000 emails and documents; the devices of Scott Boehmke, John Bares, Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, James Haslim, and Asheem Linaval; and all four locations at which there is

1 ongoing LiDAR development. To date, Waymo has conducted approximately 55 hours of  
2 inspection, with additional requests for investigation.

3 Defendants will produce additional non-privileged documents, if such documents exist  
4 and can be located through a reasonably diligent search, sufficient to show PCB design  
5 schematics for LiDAR receive boards in LiDAR designs developed by Defendants.

6 To the extent this Request seeks anything other than the previously described information,  
7 Defendants object to this Request as unreasonably overbroad, irrelevant, outside the scope of this  
8 litigation, harassing, and not proportional to the needs of the case, including to the extent that it  
9 requests information about LiDAR designs developed by third-parties and to the extent that it  
10 seeks “all PCB design schematics.” Defendants further object to this Request to the extent that it  
11 seeks information protected by the attorney-client privilege or the work product doctrine or that is  
12 otherwise privileged or protected from discovery. Defendants further object to this Request on  
13 the ground that the phrase “considered or implemented” is vague and ambiguous.

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15 **REQUEST FOR PRODUCTION NO. 254:**

16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
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22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 255:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 256:**

DOCUMENTS sufficient to show all PCB design schematics for radar sensors considered or implemented by DEFENDANTS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 256:**

Defendants object to this Request as unreasonably overbroad, irrelevant, outside the scope of this litigation, harassing, and not proportional to the needs of the case, including to the extent that it requests “all” PCB design schematics for “radar sensors” designs. Defendants further object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request on the ground that the phrase “considered or implemented” is vague and ambiguous.

Defendants will not produce documents in response to this Request.

**REQUEST FOR PRODUCTION NO. 257:**

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**REQUEST FOR PRODUCTION NO. 258:**

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**REQUEST FOR PRODUCTION NO. 259:**

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[REDACTED]

**REQUEST FOR PRODUCTION NO. 260:**

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[illegible]

**REQUEST FOR PRODUCTION NO. 262:**

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**REQUEST FOR PRODUCTION NO. 263:**

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**REQUEST FOR PRODUCTION NO. 264:**

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**REQUEST FOR PRODUCTION NO. 265:**

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Dated: June 30, 2017

MORRISON & FOERSTER LLP

By: /s/ Arturo J. González  
ARTURO J. GONZÁLEZ

Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

va-497849

**APPENDIX**

**Information on Document Collections and  
Production Under Supplemental Order ¶ 13**

Defendants further provide information on their collection efforts under Paragraph 13 of the Supplemental Order. As of June 30, 2017, Defendants have searched the following sources of information that may contain material responsive to Waymo's requests for production:

- Defendants' custodial document repositories (e.g., email repositories, Google Docs, locally stored electronic documents)
- Defendants' internal non-custodial document repositories (e.g., Slack channels, Git repository, LiDAR-related servers, personnel files)
- Publicly available websites on the Internet
- Data room for the Uber – Ottomotto acquisition transaction

As of June 30, 2017, the following individuals employed by Defendants have searched for documents that may contain material responsive to Waymo's requests for production:

- Niranjan Arigai (Operations Program Manager) – documents relating to LiDAR designs and development
- John Bares (Operations Director) – documents and email communications
- Ben Becker (Software Engineer) – documents relating to LiDAR designs and development
- Marlon Bocalan (Engineer) – documents relating to LiDAR designs and development
- Scott Boehmke (Engineering Manager) – documents and email communications relating to LiDAR designs and development
- Felipe Caldeira (Supply Chain Engineer) – documents relating to LiDAR designs and development
- Prashant Chouta (Global Supply Management) – documents and email communications relating to LiDAR designs and development
- Melanie Day (Software Engineer) – documents relating to LiDAR designs and



development

- Robert Doll (Senior Engineer) – documents and email communications relating to LiDAR designs and development
- Carolyn Finney (Mechanical Design Engineer) – documents relating to LiDAR designs and development
- Jim Gasbarro (Hardware Engineer) – documents and email communications relating to LiDAR designs and development
- Andrew Glickman (Senior Counsel) – electronic documents and email data
- Daniel Gruver (Engineer, Program Manager) – documents and email communications relating to LiDAR designs and development
- James Haslim (Senior Engineering Manager) – documents and email communications relating to LiDAR designs and development
- Jeff Holden (Chief Product Officer) – electronic documents and email data
- Florin Ignatescu (Electrical Engineer) – documents and email communications relating to LiDAR designs and development
- Travis Kalanick (former Chief Executive Officer) – email data and text messages
- Mike Karasoff (Software Engineer) – documents relating to LiDAR designs and development
- Adam Kenvarg (Mechanical Engineer) – documents and email communications relating to LiDAR designs and development
- George Lagui (Engineer) – documents and email communications relating to LiDAR designs and development
- Anthony Levandowski (former Head of Advanced Technologies Group) – email data and text messages
- Max Levandowski (Mechanical Engineer) – documents and email communications relating to LiDAR designs and development
- Asheem Linaival (Hardware Engineer) – documents and email communications relating to LiDAR designs and development

- 1 • Tri Luong (Electrical Engineer) – documents relating to LiDAR designs and  
2 development
- 3 • Christian Lymn (Director, Corporate Legal Affairs) – electronic documents and  
4 email data
- 5 • Mark Marzona (Test Engineer) – documents relating to LiDAR designs and  
6 development
- 7 • Brian McClendon (former Vice President) – email data
- 8 • Eric Meyhofer (Head of Advanced Technologies Group) – documents and email  
9 communications relating to LiDAR designs and development
- 10 • Matthew Palomar (Hardware Engineer) – documents relating to LiDAR designs  
11 and development
- 12 • Gaetan Pennecot (Optical Engineer) – documents and email communications  
13 relating to LiDAR designs and development
- 14 • Cameron Poetzscher (Vice President, Corporate Development) – electronic  
15 documents and email data
- 16 • Nina Qi (Senior Manager, Corporate Development) – electronic documents and  
17 email data
- 18 • Daniel Ratner (Mechanical Engineer) – documents and email communications  
19 relating to LiDAR designs and development
- 20 • Ana Rayo (Engineer) – documents relating to LiDAR designs and development
- 21 • Ognen Stojanovski (Government Relations) – electronic documents and email data
- 22 • John Tobias (Software Engineer) – documents relating to LiDAR designs and  
23 development
- 24 • William Treichler (Layout Engineer) – documents relating to LiDAR designs and  
25 development
- 26 • Filip Trojanek (Engineer) – documents and email communications relating to  
27 LiDAR designs and development
- 28 • Vitaly Winter (Senior Test Development Engineer) – documents relating to

LiDAR designs and development

- Steven Wu (Global Product Operations) – documents and email communications relating to LiDAR designs and development
- Jessica Yox (Mechanical Engineer) – documents relating to LiDAR designs and development

**CERTIFICATE OF SERVICE**

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 755 Page Mill Road, Palo Alto, CA 94304. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on June 30, 2017, I served true and correct copies of the following documents:

- **DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S OBJECTIONS AND RESPONSES TO WAYMO'S THIRD SET OF REQUESTS FOR PRODUCTION (NOS. 153-265)**

☒ **BY ELECTRONIC SERVICE [Fed. Rule Civ. Proc. rule 5(b)]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system to the e-mail address(es) set forth below, or as stated on the attached service list per agreement in accordance with Federal Rules of Civil Procedure rule 5(b).

Recipient	Email Address:
Charles K. Verhoeven David A. Perlson Melissa Baily John Neukom Jordan Jaffe James D. Judah John W. McCauley Felipe Corredor Grant Margeson Andrew M. Holmes Jeff Nardinelli Lindsay Cooper QUINN EMANUEL URQUHART & SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, CA 94111-4788	<a href="mailto:gewaymo@quinnemanuel.com">gewaymo@quinnemanuel.com</a>
Leo P. Cunningham Wilson Sonsini Goodrich & Rosati 650 Page Mill Road Palo Alto, CA 94304-1050  <i>Attorneys for Plaintiff Waymo LLC</i>	<a href="mailto:lcunningham@wsgr.com">lcunningham@wsgr.com</a>

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7 8 9 10	John L. Cooper Farella Braun + Martel LLP Russ Building 235 Montgomery Street, 17th Floor San Francisco, CA 94104  <i>Special Master</i>	<a href="mailto:JCooper@fbm.com">JCooper@fbm.com</a> <a href="mailto:MCate@fbm.com">MCate@fbm.com</a>

11 I declare under penalty of perjury that the foregoing is true and correct. Executed at Palo  
12 Alto, California, this 30th day of June 2017.

13 Ethel Villegas

14 (typed)

13 /s/ Ethel Villegas

14 (signature)